

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC.,

Case No. 3:20-cv-00451

Plaintiffs,

V.

Jury Demand

**Broadcom Inc.,
Brocade Communications Systems LLC, and
Extreme Networks, Inc.,**

Defendants.

PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Come now Plaintiffs SNMP Research, Inc. (“SNMP Research”) and SNMP Research International, Inc. (“SNMP Research International”), by and through counsel, and pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, and this Court’s Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], and seek leave of this Court to submit a certain document under seal.

Plaintiffs move for leave to file discrete portions of Plaintiffs' Opposition To Extreme Networks, Inc.'s Motion To Dismiss The Amended Complaint ("Opposition") under seal because: (1) the Court previously sealed identical or similar documents; (2) the parties previously agreed that the terms of the license agreements at issue in this case would be maintained as confidential; (3) the documents contain commercially-sensitive information.

Discrete portions of the Opposition refer to terms from the license agreement between Plaintiff SNMP International and Defendant Extreme Networks, Inc. (Dkt. 246-2, Exhibit C to the Amended Complaint). The parties agreed at the time they entered into this license agreement that

the license agreement and the provisions thereof would be treated as confidential. Moreover, in accordance with the Court's decisions in this case to seal and redact commercially sensitive information and proprietary financial elements of Plaintiffs' agreements with customers, [Docs. 89, 227, 247], Plaintiffs request redaction of certain terms to protect commercially sensitive financial elements of Plaintiffs' agreements with customers, including commercially sensitive negotiated terms and conditions.

Respectfully submitted this 6th day of April, 2023.

/s/ John L. Wood

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